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June 15, 2023

**Via ECF**

The Honorable Judge Gary R. Brown  
United States District Court—E.D.N.Y.  
100 Federal Plaza  
Central Islip, NY 11722

Re: Wilmington PT Corp. v. Danialian, et al., 19-cv-1972-GRB-JMW

Dear Judge Brown,

We represent Plaintiff Wilmington PT Corp. (“Plaintiff”) in the above-referenced foreclosure action. On June 12, 2023, Plaintiff filed a request that Your Honor *nunc pro tunc* the Additional Notice of Pendency to a date at least 20 days prior to the entry of the Judgment of Foreclosure and Sale [Docket No. 72]. Please accept this letter in reply to Defendants’ opposition to Plaintiff’s request [Docket No. 73].

While Plaintiff disagrees with Defendants’ opposition, rather than unnecessarily litigating this issue, Plaintiff respectfully requests that Your Honor vacate the Judgment of Foreclosure and Sale Order entered on April 4, 2023 [Docket No. 71] and re-enter the Judgment of Foreclosure and Sale Order as soon as the Court is able to, as more than 20 days have elapsed since the filing of the Additional Notice of Pendency on May 18, 2023. This will alleviate any purported “prejudices” as indicated in Defendants’ letter. Annexed hereto is the proposed Judgment of Foreclosure and Sale Order.

We thank the Court for its time and review of the within requests.

Respectfully submitted,

/s/ Alan H. Weinreb  
Alan Weinreb, Esq.

Enclosure

cc: all parties to be noticed (via ECF)

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WE ARE A DEBT COLLECTOR AND ARE ATTEMPTING TO COLLECT A DEBT.  
ANY INFORMATION OBTAINED WILL BE USED FOR THAT PURPOSE.

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